

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HONEYWELL INTERNATIONAL INC.,

Petitioner,

v.

MAZARS USA LLP,

Respondent.

Misc. Case No. _____

Original Proceeding:

*Honeywell International Inc. v. North
American Refractories Company Asbestos
Personal Injury Settlement Trust*, Adv.
Proc. No. 21-2097 (Bankr. W.D. Pa.)

**NOTICE OF HONEYWELL INTERNATIONAL INC.'S MOTIONS TO COMPEL OR
IN THE ALTERNATIVE, TO TRANSFER TO THE BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

PLEASE TAKE NOTICE that upon the accompanying (i) Memorandum of Law in Support of Petitioner Honeywell International Inc.'s Motion to Compel or Alternatively, to Transfer to the Bankruptcy Court for the Western District of Pennsylvania, and (ii) Declaration of Lisa Esayian, dated December 31, 2021 and the exhibits attached thereto, Honeywell International Inc. ("Honeywell"), by and through its undersigned counsel, will and hereby does move this Court at the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 for an Order (a) pursuant to Rule 45(g) and Rule 37(a)(1) of the Federal Rules of Civil Procedure to compel compliance with a third-party subpoena issued to Mazars USA LLP ("Mazars") from the United States Bankruptcy Court for the Western District of Pennsylvania in connection with *Honeywell International Inc. v. North American Refractories Company Asbestos Personal Injury Settlement Trust*, Adv. Proc. No. 21-2097 (Bankr. W.D. Pa.), and (b) pursuant to Fed. R. Civ. P. 45(f) to transfer the Motion to Compel to Bankruptcy Judge Thomas P. Agresti in the Bankruptcy Court

for the Western District of Pennsylvania, who is presiding over the 2021 NARCO Litigation, and
for such other and further relief as the Court deems just and proper.

Dated: New York, NY
December 31, 2021

/s/ Rachel M. Fritzler

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